

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

MAKE THE ROAD NEW YORK, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

No. 18-cv-2445 (NGG) (TAM)

June 28, 2022

JOINT STATUS REPORT

Pursuant to the Court's Order of May 4, 2022, ECF 95, the parties submit the following report on the progress of negotiations.

On May 24, 2022, Plaintiffs submitted a potential settlement proposal regarding the FOIA documents to Defendants to resolve this matter, reserving rights with regard to fees and costs. After Defendants reviewed that offer, the parties met and conferred on June 22, 2022. The parties agreed to continue to negotiate in good faith, and agreed that they would meet and confer again on July 13, 2022, and on August 10, 2022.

The parties respectfully request that they be permitted to file a further joint status report on August 29, 2022, updating the Court on the progress of their negotiations, and, if appropriate, proposing a schedule for further proceedings.

Dated: June 28, 2022

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

MARCIA BERMAN
Assistant Branch Director

Application granted.

So Ordered *ms*

s/Nicholas G. Garaufis

Hon. Nicholas G. Garaufis

Date: *6/28/22*

/s/ Cormac Early

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